

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

July 18, 2023

BY EMAIL AND CERTIFIED MAIL

United States Attorney for the Eastern District of New York
Attn: Jonathan Seigel, Gillian Kassner, & Dylan A. Stern
271 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Carlos Watson and Ozy Media, Inc.*, 23-cr-82 (EK)

Dear Counsel:

Criminal defendants have a constitutional right to be provided with enough information so that they may adequately prepare a defense. Pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure and consistent with Local Criminal Rule 16.1 in the Eastern District of New York, I write to enforce this right for Mr. Watson.

Accordingly, we request the following information:

1. With regard to Count One of the Indictment, ¶ 99(d), please specify which contracts were allegedly falsified and how.
2. With regard to Count One of the Indictment ¶ 99(o), please specify for what years the general ledger was allegedly falsified.
3. With regard to Count Two of the Indictment, ¶¶ 100-101, please provide specific information regarding Mr. Watson's role and participation in the alleged conspiracy, including but not limited to any overt acts attributed to him in furtherance of the conspiracy.

We respectfully request that you respond to this letter within ten business days. I thank you in advance for your cooperation.

Sincerely yours,



Ronald S. Sullivan Jr., Esq.
Counsel for Carlos Watson

cc: Clerk of the Court (EK) (by ECF) (without enclosures)
Kenneth Jamal Montgomery, Esq. (Counsel for Ozy Media, Inc.)